

**UNITED STATES BANKRUPTCY COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

In re:)	
)	
GAGE FAMILY ENTERTAINMENT, LLC.,)	Case No. 11-61485-11
)	
Debtor.)	

**UNITED STATES TRUSTEE'S COMMENT AND
PROTECTIVE OBJECTION TO DEBTOR'S APPLICATION TO EMPLOY ATTORNEY**

In response to Debtor's Application for Order Authorizing Debtor to Employ Attorney ("Application"), the United States Trustee respectfully advises the Court:

1. Debtor filed a Chapter 11 voluntary petition on July 12, 2011. On the same date, Debtor filed the Application. Objections to the Application are due August 2, 2011.
2. Debtor has common ownership with Gage's Long Creek Marina, LLC, and Hollister Town Plaza, LLC.
3. Hollister Town Plaza, LLC, filed a Chapter 11 voluntary petition on June 21, 2011, as Case No. 11-61319, and Gage's Long Creek Marian, LLC filed a Chapter 11 voluntary petition on June 20, 2011, as Case No. 11-61319.
4. None of the debtors have filed schedules and statements of affairs. Upon information and belief, the Debtors may have common debts or have guaranteed common debts. It is unknown if any Debtor is indebted to the other Debtors.
5. Each Debtor has applied to employ David E. Schroeder as their attorney to represent them in each bankruptcy case. The affidavit submitted with the applications does not disclose the concurrent representation of each Debtor that share common ownership and does not disclose any connections – such as common debts, guarantees, or inter-company debts. The United States Trustee suggests that further disclosure is

necessary by proposed counsel regarding these issues.

6. The United States Trustee files this comment and protective objection to preserve the objection deadline, and to allow time to receive and review the schedules and statements for each Debtor to determine what, if any, connections exist among the Debtors or what, if any, transactions have occurred between the three Debtors.

WHEREFORE, the United States Trustee requests the Court's order for such relief as is just and proper.

Respectfully submitted,

NANCY J. GARGULA
UNITED STATES TRUSTEE

BY: /s/ Jerry L. Phillips
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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was served by United States Mail, postage prepaid, this 12th day of July 2011 upon parties who have requested notice but do not receive notice via the electronic court filing system.

/s/ Jerry L. Phillips